

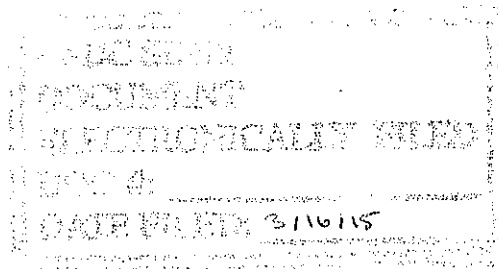
**MERCHANT**  
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**VIA ECF/CM**

March 9<sup>th</sup>, 2015

The Honorable Loretta A. Preska  
Chief Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007



**Re: United States v. Israel Reyes et al.**  
**Docket No. 14-CR-483 (LAP)**

Dear Judge Preska:

On March 5<sup>th</sup>, 2015, Attorney Daniel Ollen advised me that he was retained to take over Mr. Reyes' representation and that he would be filing a notice of appearance with the Court. Mr. Ollen further advised me not to file any motions. While Mr. Ollen has filed a notice of appearance in this matter, he has not yet filed a motion to substitute and it appears that I am therefore still listed as attorney of record for Mr. Reyes.

① In circumstances where Mr. Reyes has retained new counsel, I write to respectfully request that the motion filing deadline be extended by one month so that Mr. Ollen can familiarize himself with the file.

I have not been able to get a hold of Mr. Quigley to see whether the Government consents to this extension.

The Court previously granted Mr. Reyes a one week extension in this matter.

Respectfully,

Merchant Law Group LLP

By:

Daniel DeMaria

Digitally signed by Daniel DeMaria  
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Date: 2015.03.09 16:45:39 -0400

② Time is excluded until the  
filing deadline in the  
interests of justice.

Sordered  
Loretta A. Preska  
USDJ

March 11, 2015